

## ASSURANCE OF VOLUNTARY COMPLIANCE

**In the matter of:**

**Global Media Source, Inc., dba Advantage Consumer Savings, and Merchants 411 Services; and**

**Khalid Ismail;**

### **Respondents.**

The above-named Respondents enter into this Assurance of Voluntary Compliance (AVC) in order to resolve concerns of the Iowa Attorney General relating to Respondents' pre-AVC charging of the financial institution accounts (i) of individual Iowa consumers in the amount of \$19,080.90 for memberships (of which \$1,348.65 has been refunded) and (ii) of Iowa businesses in the amount of \$29,985.00 for online advertising (of which \$1,499.25 has been refunded). The Attorney General alleges that the above-referenced membership marketing that purportedly gave rise to such charges violated the Iowa Consumer Fraud Act, Iowa Code § 714.16 ("CFA") and/or the Iowa Buying Club Memberships Law, Iowa Code Ch. 552A ("BCL"); that the above-referenced marketing of online advertising violated the CFA; and that the charges associated with all such marketing were unauthorized or otherwise unlawful.

The Attorney General releases Respondents from liability under the CFA and BCL for the marketing associated with the above-referenced charges and for such charges themselves, such release to take effect upon the receipt by the Attorney General from Respondents of the total payment described below.

Respondents, and each of them, agree: (1) to refrain from engaging or participating, directly or indirectly, in the marketing to Iowa individuals or businesses of (a) any membership program subject to the BCL; and/or (b) any advertising (online or otherwise) or other merchandise subject to the CFA; including in each instance charging financial institution accounts in connection with any such marketing; (2) to pay \$46,218.00 to be used in the Iowa Attorney General's discretion to make refunds to the Iowa individuals and businesses affected by the above-referenced conduct, with any funds remaining after reasonable efforts to go into the fund created by Iowa Code § 714.16A; (3) to refrain from any use or transfer of the names of Iowans who are or were eligible for a refund under (2) above; (4) to respond fully and promptly to reasonable requests from the Attorney General for information or materials relating to the activities prohibited above or compliance with this AVC; and (5) that any future violation of this AVC shall constitute a violation of the CFA, and that any such AVC violation if proved by a preponderance of evidence shall give rise to civil penalties and other remedies as set forth in the CFA and/or other applicable law.

Date: Jan 18<sup>th</sup>, 2017

  
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Global Media Source, Inc.  
by Khalid Ismail

Date: Jan 18<sup>th</sup>, 2017

  
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Khalid Ismail

Accepted by:

Date: Jan. 23, 2017

  
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Steve St. Clair  
Assistant Iowa Attorney General